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July 29, 2022

Honorable Taryn A. Merkl, U.S.M.J.
United States District Court
Eastern District Of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Morales et al. v. Fourth Avenue Bagel Boy, Inc. et al.
18 Civ. 3734 (DLI) (TAM)

Dear Judge Merkl:

We respectfully submit this status report pursuant to the Order, dated July 15, 2022.

First, we spoke with Mr. Natale on July 22, 2022 regarding Defendants' deficient discovery responses. While Mr. Natale provided certain information, Defendants' discovery responses remain deficient. Rather than pursue those issues at this time, we would prefer to proceed with submission of a joint pretrial order and reserve the right to seek additional discovery from Defendants in connection with any future proceedings to enforce a judgment.

Second, this confirms that after the May 19, 2022 conference, we conveyed Mr. Natale's most recent settlement offer to Mr. Morales. Mr. Morales has rejected that offer.

Third, we reiterated Mr. Morales' position regarding Mr. Natale's inquiries and we produced an additional document to Mr. Natale supporting Mr. Morales' position.

We respectfully request that the due date for a joint pretrial order be a date in late September 2022. Thank you for Your Honor's attention to this matter.

Respectfully submitted,
/s/ Kenneth A. Goldberg
Kenneth A. Goldberg